

REMARKS:

This paper is herewith filed in response to the Examiner's final Office Action mailed on January 7, 2008 for the above-captioned U.S. Patent Application. This office action is a final rejection of claims 1-40 of the application.

More specifically, the Examiner has rejected claims 1-4, 6-7, 9-10, 12-16, 18-19, 21-22 and 25-31 are rejected under 35 USC 103(a) as obvious over Phillips (US6,192,041) in view of Wang (US6,230,024); claims 5, 8, 17 and 20 are rejected under 35 USC 103(a) as obvious over Phillips in view of Wang and Saha (US2003/0212822); claims 11-12, and 23-24 are rejected under 35 USC 103(a) as obvious over Phillips in view of Wang and Brandenberger (US6,570,782); and claims 32-40 are rejected under 35 USC 103(a) as obvious over Phillips in view of Wang and Cui (US2004/0204069). The Applicants respectfully disagree with the rejections.

Claims 1, 8, 13, 20, 25, 29, and 31 have been amended for clarification. Claims 25-40 have been amended for mere formality. Support for the amendments can be found at least on page 4, lines 1-9; and page 6, lines 1-8. No new matter is added.

Claim 1 as amended recites:

A method, comprising: initiating a set up of an internet protocol (IP) connection between a mobile station (MS) and a computing device (CD) that terminates at the MS with a command received from the CD over a local interface; establishing the IP connection between the MS and CD comprising assigning IP addresses to the local interface and configuring an IP protocol stack at the MS; and in response to receiving over the IP connection an IP message at the MS from the CD, routing the received IP message to an application that is resident in the MS, wherein the IP connection between the MS and the CD is regardless of any connection between the MS and a cellular network.

The Applicants respectfully assert that none of the references cited disclose or suggest at least the inventive step of "establishing the IP connection between the MS and CD comprising **assigning IP addresses for the local interface and configuring an IP protocol stack at the MS**" as

recited in claim 1.

As cited by the Examiner Phillips discloses:

“The laptop computer is provided with a hardwire direct connection 28 to a cellular telephone 30 which is capable of CDMA asynchronous data service,” (col. 3, lines 14-16); and

“This invention makes it possible to use such popular networking application software by having the cellular telephone, upon receipt of a preselected "reserved" phone number, return the CONNECT signal, thereby inducing the networking application software to send the PPP data packets,” (col. 3, line 64 to col. 4, line 2).

Thus, it can be seen that Phillips relates to PPP communications between a laptop and a cellular phone over hardwire direct connection 28 where the cellular phone is capable of CDMA asynchronous data service.

The Applicants contends that nowhere in Phillips can there be found any reference which can be seen to disclose or suggest “establishing the IP connection between the MS and CD comprising assigning IP addresses for the local interface and configuring an IP protocol stack at the MS” as in claim 1.

Further, in the rejection of claim 1 the Examiner states:

“Phillips is silent in teaching terminating an IP connection on the MS. Wang teaches terminating an IP connection on the MS (column 4 lines 36-53). It would have been obvious to one of ordinary skill in the art at the time of applicant's invention was made to implement Wang's teach in Phillip's teaching to come up with terminating an IP connection on the MS. The motivation for doing so would be to end connection so that a transition from voice to digital fax could start therefore being prepared to receive a digital fax (column 3 lines 36-53),” (emphasis added).

The Applicants contend that neither column 3, lines 36-53 nor column 4, lines 36-53 in Wang

disclose or suggest establishing an IP connection between an MS and a CD comprising assigning IP addresses for the local interface and configuring an IP protocol stack at the MS, and similarly neither citation discloses or suggests that the IP connection between the MS and the CD is regardless of any connection between the MS and a cellular network as in claim 1.

The Applicants note that in a more relevant part Wang discloses:

“Concurrently with or after receiving signals 218 and 222, mobile station 104 and base station 114 takes steps to initialize the fax call as shown generally in signal 226. As may be seen, the block diagram shown as signal 226 includes a caption SYNCH TCP/IP-PPP-RLP. The signals in this block represent initialization signals for setting up a digital fax call as specified in standard IS-707. More specifically, the radio link protocol (RLP) is first established on the traffic channel after which the Point-to-Point Protocol (PPP) and the internet Protocol (IP) layers are initialized between the mobile station and the base station 114 (or IWF). A data channel for bearer traffic (digital fax signals) is established after this initialization,” (emphasis added), (col. 4, lines 53-65).

The Applicants note that Wang discloses “the Point-to-Point Protocol (PPP) and the internet Protocol (IP) layers are initialized between the mobile station and the base station 114,” The Applicants submit that this statement merely indicates that both PPP and IP layers may be initialized at some different points along the path between the mobile station and the Base station. Further, Wang discloses “The signals in this block represent initialization signals for setting up a digital fax call as specified in standard IS-707.” The Applicants note that here “the signals in this block” appear to refer to the SYNCH TCP/IP-PPP-RLP signals between the MS 104 and the BS 114 in Wang. Clearly, in Wang the received signals 218 and 222 are not **regardless** of the signals between the MS 104 and the BS 114.

Moreover, the Applicants direct the Examiner to at least Figures 2, 3, and 4 of Wang where it can be clearly seen that the communication signals between the PC 102 and MS 104 simply **do not include Internet Protocol layers or an IP connection** that is terminated on a mobile station. Certainly, Wang is not seen to disclose or suggest assigning IP addresses for a local interface and configuring an IP protocol stack at the MS.

The Applicants contend that neither Phillips nor Wang can be seen to disclose or suggest at least where claim 1 recites establishing an IP connection between an MS and a CD comprising assigning IP addresses for the local interface and configuring an IP protocol stack at the MS, and wherein the IP connection between the MS and the CD is regardless of any connection between the MS and a cellular network as in claim 1.

The Applicants contend that for at least the reasons stated the references cited can not be seen to disclose or suggest claim 1 and the rejection of claim 1 should be removed.

Further, the Applicants contend that as the independent claims 13 and 25 recite features similar to claim 1 as stated above, for at least the reasons already stated the references cited can not be seen to disclose or suggest these claims.

In addition, the Applicants submit that none of the references cited are seen to address a shortfall of Phillips and Wang as stated above.

Additionally, claims 8, 20, and 31 recite the IP addresses for the local interface are **arbitrary**, support at least at page 6, line 6. This is clearly well beyond any ordinary skill modification of Phillips and/or Wang.

In addition, the Applicants respectfully assert that although all the rejections in the final Office Action have not been argued the Applicants do not acquiesce to these rejections.

Furthermore, for at least the reason that the claims 2-12, 14-24, and 26-40 depend from claims 1, 13, and 25, respectively, the references cited are not seen to disclose or suggest all claims 1-40. Thus, for at least the reasons stated the rejection of all claims 1-40 should be removed.

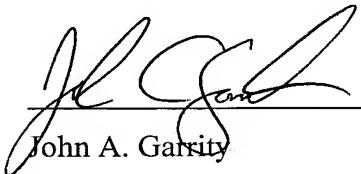
Based on the above explanations and arguments, it is clear that the references cited cannot be seen to disclose or suggest claims 1-40. The Examiner is respectfully requested to reconsider and

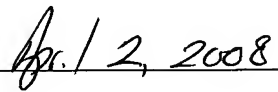
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remove the rejections of claims 1-40 and to allow all of the pending claims 1-40 as now presented for examination.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record. Should any unresolved issue remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted:



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4/2/2008

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